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6  
7 ***Interim Lead Counsel***  
***for the Indirect Purchaser Plaintiffs***

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10  
11 **IN RE: CATHODE RAY TUBE (CRT)** ) Master File No. CV-07-5944 SC  
12 **ANTITRUST LITIGATION** )  
13 ) MDL No. 1917  
14 )  
15 ) **DECLARATION OF LAUREN C.**  
16 ) **RUSSELL IN SUPPORT OF THE**  
17 ) **INDIRECT PURCHASER PLAINTIFFS'**  
18 ) **NOTICE OF MOTION AND MOTION TO**  
19 ) **AUTHORIZE SERVICE ON CERTAIN**  
20 ) **FOREIGN DEFENDANTS PURSUANT**  
21 ) **TO FEDERAL RULE OF CIVIL**  
22 ) **PROCEDURE 4(F)(3)**  
23 )

24 **This document relates to:** ) Date: September 5, 2008

25 ) Time: 10:00 a.m.

26 **ALL INDIRECT PURCHASER ACTIONS** ) Court: One, 17th Floor

27 )  
28 ) The Honorable Samuel Conti

29  
30 I, Lauren C. Russell, declare:

31 1. I am an attorney duly licensed by the State of California and am admitted to  
32 practice before this Court. I am an associate of the law firm Trump, Alioto, Trump & Prescott,  
33 LLP and my firm serves as Interim Lead Counsel for the Indirect Purchaser Plaintiffs in the  
34 above-captioned action. The matters set forth herein are within my personal knowledge and if  
35 called upon and sworn as a witness I could competently testify regarding them.

1           2. This is a consolidated class action brought under federal and state antitrust laws  
2 alleging price-fixing and other anticompetitive conduct by manufacturers of Cathode Ray Tubes  
3 and products containing Cathode Ray Tubes.

4           3. By Order dated February 15, 2008, the Judicial Panel on Multidistrict Litigation  
5 transferred all related Cathode Ray Tube Cases ("CRT Cases") to this Court for coordinated  
6 and/or consolidated pretrial proceedings.

7           4. The Indirect Purchaser Plaintiffs ("Plaintiffs") name a total of 36 defendants, 21 of  
8 which are located abroad. These 21 foreign defendants are located in 11 different countries. Some  
9 of these countries are signatories to the Hague Convention on Service Abroad of Judicial and  
10 Extrajudicial Documents ("The Hague Convention"), and others are not. These non-signatory  
11 countries require that service be effected on their citizens and corporations via Letters Rogatory.

12           5. Of the 21 foreign defendants, 6 have made general appearances in the *CRT Cases*,  
13 thereby obviating the need for Plaintiffs to formally serve them with an indirect purchaser  
14 summons and complaint.

15           6. Most of the countries where defendants are located require that the summons and  
16 complaint be translated into that country's language for service. In this case, this will mean  
17 translating the summons and complaint into 7 different languages.

18           7. APS International, Inc., an international process server, informs me that the total  
19 cost of serving the remaining 15 foreign defendants will be approximately \$30,000 and that, on  
20 average, service of process through the methods prescribed by the Hague Convention takes 4-6  
21 months and Letters Rogatory can take up to a year or more.

22           8. The following foreign defendants have a United States wholly-owned subsidiary  
23 or related entity that has been named as a defendant in the *CRT Cases* and has appeared in these  
24 cases through counsel:

25           //

26           //

27

28

1	Foreign Defendant	United States Subsidiary/Related Entity	United States Counsel
2	Hitachi, Ltd.	Hitachi America, Ltd.	Morgan Lewis & Bockius, LLP
3	Hitachi Asia, Ltd.	Hitachi America, Ltd.	Morgan Lewis & Bockius, LLP
4	Koninklijke Phillips Electronics N.V. a/k/a Royal Phillips N.V.	Phillips Electronics North America Corporation	Howrey LLP
5	Matsushita Electric Industrial Co., Ltd.	Panasonic Corporation of North America	Dewey LeBoeuf LLP AND Weil, Gotshal & Manges, LLP
6	Matsushita Toshiba Picture Display Co., Ltd.	MT Picture Display Corporation of America (New York)	Dewey LeBoeuf LLP Weil, Gotshal & Manges, LLP
7	Samsung Electronics Co., Ltd.	Samsung Electronics America, Inc.	Sheppard Mullin Richter & Hampton, LLP
8	Toshiba Corporation	Toshiba America, Inc.	White & Case, LLP

9. Foreign defendants Samsung Electronics Co., Ltd. ("Samsung") and Royal  
 10. Phillips N.V. ("Royal Phillips") have been served by the direct purchaser plaintiffs.

11. The same attorneys that represent the U.S. subsidiaries of Samsung and Royal  
 12. Phillips in the *CRT Cases* have informed Plaintiffs that they also represent Samsung and Royal  
 13. Phillips.

14. Defendants Matsushita Electric Industrial Co., Ltd. and Matsushita Toshiba  
 15. Picture Display Co., Ltd. have appeared in the direct purchaser case, and are represented by the  
 16. same attorneys that represent their U.S. wholly-owned subsidiaries, Panasonic Corporation of  
 17. North America and MT Picture Display Corporation of America (New York).

1       12. On July 11, 2008, I sent an e-mail to counsel for the U.S. Subsidiary Defendants,  
2 with a draft of the Motion To Authorize Service On Certain Foreign Defendants Pursuant to  
3 Federal Rule of Civil Procedure 4(f)(3), requesting that the U.S. Subsidiary Defendants accept  
4 service of the indirect purchaser summons and complaint for their foreign affiliates. The e-mail  
5 also requested that counsel inform us if they intend to oppose the motion. None of the U.S.  
6 Subsidiary Defendants responded to the e-mail.

7       13. The other 8 foreign defendants are not the subject of this motion because they do  
8 not have a United States wholly-owned subsidiary, related entity, or counsel that is already  
9 involved in this case. Plaintiffs are in the process of serving these defendants in accordance with  
10 The Hague Convention or by Letters Rogatory.

11 14. Foreign defendants LG Electronics, Inc., LP Displays International, Ltd. (f/k/a LG  
12 Phillips Displays), Irico Group Corporation, Irico Display Devices Co., Ltd., Beijing-Matsushita  
13 Color CRT Company, Ltd., and Samsung SDI Co., Ltd. have been served by the direct purchaser  
14 plaintiffs and have appeared in both the direct and indirect cases.

15        15. Attached hereto as Exhibit A is a true and correct copy of the Proof of Service on  
16 foreign defendants Samsung Electronics Co., Ltd. and Koninklijke Phillips Electronics N.V. a/k/a  
17 Royal Phillips N.V.

18 16. Attached hereto as Exhibit B is a true and correct copy of the Notice of  
19 Appearance by Kris Man on behalf of defendant Matsushita Electric Industrial Co., Ltd.

20 17. Attached hereto as Exhibit C is a true and correct copy of the Notice of  
21 Appearance by Kris Man on behalf of defendant MT Picture Display Co., Ltd.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is  
23 true and correct. Executed this 1st day of August, 2008 at San Francisco, California.

/s/ Lauren C. Russell

Lauren C. Russell

***Interim Lead Counsel  
for the Indirect Purchaser Plaintiffs***

# **EXHIBIT A**

1 GUIDO SAVERI (22349)  
2 guido@saveri.com  
3 R. ALEXANDER SAVERI (173102)  
4 rick@saveri.com  
5 CADIO ZIRPOLI (179108)  
6 zirpoli@saveri.com  
7 SAVERI & SAVERI, INC.  
8 111 Pine Street, Suite 1700  
9 San Francisco, CA 94111-5619  
10 Telephone: (415) 217-6810  
11 Facsimile: (415) 217-6813

12 Attorneys for Plaintiffs

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 IN RE CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

19 Master File No. CV-07-5944 SC

20 MDL No. 1917

21 **PROOF OF SERVICE ON CERTAIN  
22 FOREIGN DEFENDANTS**

23 This Document Relates to:

24 All Actions

1       Attached hereto as Exhibits A, B, C, and D are true and correct copies of Certificates  
2 of service of process on the following defendants, respectively: (1) LG Electronics, Inc.; (2)  
3 Samsung Electronics Co., Ltd.; (3) Samsung SDI Co., Ltd.; and (4) Koninklijke Philips  
4 Electronics N.V. ("Royal Philips").

5  
6 Dated: June 25, 2008.

Respectfully submitted,

7  
8 By: /s/ Cadio Zirpoli  
9       GUIDO SAVERI (22349)  
10      guido@saveri.com  
11      R. ALEXANDER SAVERI (173102)  
12      rick@saveri.com  
13      CADIO ZIRPOLI (179108)  
14      zirpoli@saveri.com  
15      SAVERI & SAVERI, INC.  
16      111 Pine Street, Suite 1700  
17      San Francisco, CA 94111-5619  
18      Telephone: (415) 217-6810  
19      Facsimile: (415) 217-6813

20       *Attorneys for Plaintiffs*

21      Crt.089

# EXHIBIT A

FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS

DEMANDE  
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER  
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE

Convention on the service abroad of judicial and extrajudicial documents in civil or  
commercial matters, signed at The Hague, November 15, 1965.

Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile  
ou commerciale, signée à La Haye, le 15 Novembre 1965.

<p>Identity and address of the applicant Identité et adresse du requérant</p> <p>Karina Shreefer, Esq. LEGAL LANGUAGE SERVICES 8014 State Line Road, Suite 110 Leawood, Kansas 66208 UNITED STATES OF AMERICA Tel. 1.913.341.3167</p>	<p>Address of receiving authority Adresse de l'autorité destinataire</p> <p>HAGUE CENTRAL AUTHORITY FOR THE REPUBLIC OF KOREA Ministry of Court Administration Attn.: Director of International Affairs 967, Seocho-dong, Seocho-gu, Room 503 Seoul 137-750 REPUBLIC OF KOREA</p>
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The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,  
(identity and address)

Le requérant soussigné a l'honneur de faire parvenir en double exemplaire à l'autorité destinataire les documents ci-dessous énumérés,  
en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:  
(identité et adresse) LG ELECTRONICS, INC.

LG Twin Towers 20, Yeouido-dong, Yeongdeungpo-gu, Seoul 150-721, REPUBLIC OF KOREA

(a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*  
(a) selon les formes légales (article 5, alinás premier, lettre a).

(b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:  
(b) selon la forme particulière suivante (article 5, alinás premier, lettre b) : Personal service in accordance with your internal  
law for service of documents upon persons or entities in your territory.

(c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*:  
(c) le cas échéant, par remise simple (article 5, alinás 2).

The authority is requested to return or to have returned to the applicant a copy of the documents and of the annexes\*—with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte et de ses annexes avec  
l'attestation figurant au verso.

SERVICE IS REQUESTED PURSUANT TO PUBLIC LAW 97-462 OF FEB. 26, 1983 WHICH AMENDED RULE 4(e)(2)(a)  
OF THE U.S. FEDERAL RULES OF CIVIL PROCEDURE.

List of documents

Enumération des pièces

See Attachment "A."

Done at Leawood, Kansas, U.S.A., the 11 Jan - 2008

Fait à \_\_\_\_\_, le \_\_\_\_\_

Signature and/or stamp.

Signature et/ou cachet.



<sup>1</sup> (Formerly OBD-116 which was formerly LAA-116,  
both of which may still be used)

USM-94  
(Est. 11/22/77)

\*Delete if inappropriate  
Rayer les mentions inutiles.

**Attachment "A"  
to "Request" – List of Documents**

1. Executed "Request" with Attachment "A," in duplicate
2. "Certificate" (unexecuted), in duplicate
3. "Summary" with Attachment "B," in duplicate
4. "Notice," in duplicate
5. Summons in a Civil Case with Attachment, in English and Korean, in duplicate
6. Class Action Complaint, in English and Korean, in duplicate
7. Order Setting Initial Case Management Conference and ADR Deadlines, in English and Korean, in duplicate
8. Related Case Order, in English and Korean, in duplicate
9. Order Setting Case Management Conference, in English and Korean, in duplicate
10. Contents of Joint Case Management Statement, in English and Korean, in duplicate
11. ECF Registration Information Handout, in English and Korean, in duplicate

## CERTIFICATE

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,

1) that the document has been served\*

the (date) 2008. 1. 14. 10.19

- at (place, street, number): 서울 영등포구 영등포동 20 EG. Twin Towers

- in one of the following methods authorised by article 5:

- a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention\*
- b) in accordance with the following particular method\* :

c) by delivery to the addressee, who accepted it voluntarily\*

The documents referred to in the request

三

- relationship to the addressee (family, business or other) -

### 서무계원(employee))

2) that the document has not been served by reason of the following facts\* :-

## Annexes

Documents returned :

In appropriate cases, documents establishing the service:

## 우편송달통지서

Done at 서울남부지방법원

the 2008. 3. 14.

**Signature and/or stamp**

서울남부지방법원  
법원주사 강재



\* Delete if inappropriate.

# EXHIBIT B

## REQUEST

**FOR SERVICE ABROAD OF JUDICIAL OR EXTRA-JUDICIAL DOCUMENTS**

## DEMANDE

***AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER  
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE***

**Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.**

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.*

<p><b>Identity and address of the applicant</b>  <i>Identité et adresse du requérant</i></p> <p>Karina Shreefer, Esq.    LEGAL LANGUAGE SERVICES    8014 State Line Road, Suite 110    Leawood, Kansas 66208    UNITED STATES OF AMERICA    Tel. 1.913.341.3167</p>	<p><b>Address of receiving authority</b>  <i>Adresse de l'autorité destinataire</i></p> <p>HAGUE CENTRAL AUTHORITY FOR THE REPUBLIC    OF KOREA    Ministry of Court Administration    Attn.: Director of International Affairs    967, Seocho-dong, Seocho-gu, Room 503    Seoul 137-750    REPUBLIC OF KOREA</p>
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The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,

(identity and address)

Le requérant soussigné a l'honneur de faire parvenir en double exemplaire à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:

(identité et adresse) **SAMSUNG ELECTRONICS CO., LTD.**

Samsung Main Building 250, Taepyeongno 2-ga, Jung-gu, Seoul 100-742, REPUBLIC OF KOREA

(a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*  
*(a) selon les formes légales (article 5, alin   premier, lettre a).*

(b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:  
*(b) selon la forme particuli  re suivante (article 5, alin   premier, lettre b) :*  **Personal service in accordance with your internal law for service of documents upon persons or entities in your territory.**

(c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*.

The authority is requested to return or to have returned to the applicant a copy of the documents and of the annexes\*--with a certificate

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte et de ses annexes avec l'annexation 5.

**SERVICE IS REQUESTED PURSUANT TO PUBLIC LAW 97-462 OF FEB. 26, 1983 WHICH AMENDED RULE 4(c)(2)(A) OF THE U.S. FEDERAL RULES OF CIVIL PROCEDURE.**

## List of documents

## List of documents

See Attachment 6A.”

Done at Leawood, Kansas, U.S.A., the 11 Jan. 2008

Fait à . le .

**Signature and/or stamp.**

*Signature et/ou cachet.*

**\*Delete if inappropriate**  
*Supprimer les mentions inutiles.*

1 (Formerly OBD-116 which was formerly LAA-116,  
both of which may still be used)

USM-94  
(Est. 11/22/77)

**Attachment "A"  
to "Request" – List of Documents**

1. Executed "Request" with Attachment "A," in duplicate
2. "Certificate" (unexecuted), in duplicate
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5. Summons in a Civil Case with Attachment, in English and Korean, in duplicate
6. Class Action Complaint, in English and Korean, in duplicate
7. Order Setting Initial Case Management Conference and ADR Deadlines, in English and Korean, in duplicate
8. Related Case Order, in English and Korean, in duplicate
9. Order Setting Case Management Conference, in English and Korean, in duplicate
10. Contents of Joint Case Management Statement, in English and Korean, in duplicate
11. ECF Registration Information Handout, in English and Korean, in duplicate

## CERTIFICATE

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention.

1) that the document has been served\*

- the (date) 2008. 3. 10.  
 - at (place, street, number) 서울 중구 태평로2가 250 삼성본관빌딩

- in one of the following methods authorised by article 5 :

a) \_\_\_\_\_ \* (삭제)

✓ b) in accordance with the following particular method\* :

우편송달 \* (삭제)  
 c) \_\_\_\_\_

The documents referred to in the request have been delivered to :

- (identity and description of person)

홍진혁

- relationship to the addressee (family, business or other) :

고용인 or 사무원 → employee

2) \_\_\_\_\_ \* : (삭제)

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement\*.

*Annexes*

Documents returned :

In appropriate cases, documents establishing the service :

우편송달통지서

Done at 서울중앙지방법원

the 2008. 4. 29.

Signature and/or stamp

서울지방법원 민사신청과  
 법원주사 이종현



\* Delete if inappropriate.

# EXHIBIT C

2008-1-68

14

## REQUEST

**FOR SERVICE ABROAD OF JUDICIAL OR EXTRA JUDICIAL DOCUMENTS**

## DEMANDE

**AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER  
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE**

**Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.**

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.*

<p><b>Identity and address of the applicant</b>  <i>Identité et adresse du requérant</i></p> <p>Karina Shreefer, Esq.    LEGAL LANGUAGE SERVICES    8014 State Line Road, Suite 110    Leawood, Kansas 66208    UNITED STATES OF AMERICA    Tel. 1.913.341.3167</p>	<p><b>Address of receiving authority</b>  <i>Adresse de l'autorité destinataire</i></p> <p>HAGUE CENTRAL AUTHORITY FOR THE REPUBLIC    OF KOREA    Ministry of Court Administration    Attn.: Director of International Affairs    967, Seocho-dong, Seocho-gu, Room 503    Seoul 137-750    REPUBLIC OF KOREA</p>
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The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,  
(identity and address)

Le requérant soussigné a l'honneur de faire parvenir en double exemplaire à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:  
(identité et adresse) SAMSUNG, SDI CO., LTD.

575 Shin-dong, Youngtong-gu Suwon, Kyonggi, REPUBLIC OF KOREA

(a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*  
*(a) selon les formes légales (article 5, alinéa premier, lettre a).*

(b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:  
*(b) selon la forme particulière suivante (article 5, alinéa premier, lettre b) : Personal service in accordance with your internal law for service of documents upon persons or entities in your territory.*

(c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*:  
*(c) Le cas échéant, par remise simple (article 5, alinéa 2).*

The authority is requested to return or to have returned to the applicant a copy of the documents and of the annexes\*—with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte et de ses annexes avec l'attestation figurant au verso.

SERVICE IS REQUESTED PURSUANT TO PUBLIC LAW 97-462 OF FEB. 26, 1983 WHICH AMENDED RULE 4(c)(2)(a) OF THE U.S. FEDERAL RULES OF CIVIL PROCEDURE.

### List of documents

### *Enumeration des pièces*

See Attachment "A"

Done at Leawood, Kansas U.S.A. the 11 Jan. 2008

Fait à - le

Signature and/or stamp.

*Signature et/ou cachet.*

**\*Delete if inappropriate**  
*Rayer les mentions inutiles.*

<sup>1</sup> (Formerly OBD-116 which was formerly LAA-116, both of which may still be used)

USM-94  
(Est. 11/22/77)

**Attachment "A"  
to "Request" – List of Documents**

1. Executed "Request" with Attachment "A," in duplicate
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7. Order Setting Initial Case Management Conference and ADR Deadlines, in English and Korean, in duplicate
8. Related Case Order, in English and Korean, in duplicate
9. Order Setting Case Management Conference, in English and Korean, in duplicate
10. Contents of Joint Case Management Statement, in English and Korean, in duplicate
11. ECF Registration Information Handout, in English and Korean, in duplicate

## CERTIFICATE

## 증명서

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention.  
 아래 당국은 협약 제6조에 따라 다음 사항을 확인하는 바입니다.

1) that the document has been served\*

문서가 다음과 같이 송달됨\*

- the (date) (일자) 2008. 2. 20.

- at (place, street, number) (장소) 수원시 영통구 신동 575

- in one of the following methods authorised by article 5 :  
 제5조가 규정하는 다음의 방식에 의함

a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention\*  
 협약 제5조 제1단 제1호의 규정에 따른\*

b) in accordance with the following particular method\* :  
 다음의 특정방식에 의함\*

c) by delivery to the addressee, who accepted it voluntarily\*  
 임의로 수령하는 수신인에게 교부함\*

The documents referred to in the request have been delivered to :  
 요청서에 언급된 문서는 다음의 사람에게 교부됨

- (identity and description of person) (교부받은 자의 표시)

김보람

- relationship to the addressee (family, business or other) 수신인과의 관계 (가족, 고용관계 및 기타) :  
 직원 (employee)

2) that the document has not been served, by reason of the following facts\* :  
 문서는 다음의 사유로 인하여 송달되지 못함\*

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or  
 reimburse the expenses detailed in the attached statement\*.  
 협약 제12조 제2단에 따라 신청인은 첨부된 진술서에 기재된 비용을 지불 또는 상환하여야 함\*

## Annexes

첨부서류

Documents returned :

In appropriate cases, documents establishing the service :  
 적절한 경우, 송달을 증명하는 문서

사건별 송달현황부

Done at (장소) Suwon District Court

the (일자) 2008. 03. 13.

Signature and/or stamp

서명 또는 날인 수원지방법원 민사신청부

법원 주사 김종



\* Delete if inappropriate.

\* 적절하지 아니한 경우에는 삭제합니다.

# EXHIBIT D

IR.908.132.102

**REQUEST**  
**FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**

**DEMANDE**  
**AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER**  
**D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE**

Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.

ARRONDISSEMENTSPARKET
SCRVENHAGE
Ingek. 10 MAART 2008
No.

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.*

**Identity and address of the applicant**  
**Identité et adresse du requérant**

Karina Shreefer, Esq.  
 LEGAL LANGUAGE SERVICES  
 8014 State Line Road, Suite 110  
 Leawood, Kansas 66208  
 UNITED STATES OF AMERICA  
 Tel. 1.913.341.3167

**Address of receiving authority**  
**Adresse de l'autorité destinataire**

HAGUE CENTRAL AUTHORITY FOR THE  
 NETHERLANDS  
 Public Prosecutor's Office  
 Medewerkster Internationale Rechtshulp (Team ZwaCri)  
 Prince Clauslaan 60  
 Room 724, Building P1  
 2595 AJ Den Haag  
 THE NETHERLANDS

The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,  
 (identity and address)

Le requérant soussigné a l'honneur de faire parvenir en double exemplaire à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:

(identité et adresse) KONINKLIJKE PHILIPS ELECTRONICS N.V. (KvK 17001910)

Breitner Center, Amstelplein 2, 1096 BC, Amsterdam, THE NETHERLANDS

(a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*  
 (a) *selon les formes légales (article 5, alinéa premier, lettre a).*

(b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:  
 (b) *selon la forme particulière suivante (article 5, alinéa premier, lettre b) : Personal service by gerechtsdeurwaarder J.C. Haak of*

Van der Hoeden & Mulder or by substitute gerechtsdeurwaarder upon defendant OR substituted service by gerechtsdeurwaarder  
Haak or by substitute gerechtsdeurwaarder at the address indicated; resulting expense to be borne by the Applicant.

(c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*:  
 (c) *le cas échéant, par remise simple (article 5, alinéa 2).*

The authority is requested to return or to have returned to the applicant a copy of the documents and of the annexes\*—with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte et de ses annexes avec l'attestation figurant au verso.

**SERVICE IS REQUESTED PURSUANT TO PUBLIC LAW 97-462 OF FEB. 26, 1983 WHICH AMENDED RULE 4(c)2(a)  
 OF THE U.S. FEDERAL RULES OF CIVIL PROCEDURE.**

**List of documents**

**Enumeration des pièces**

See Attachment "A."

Done at Leawood, Kansas, U.S.A., the 10 Jan. 2008

Fait à \_\_\_\_\_, le \_\_\_\_\_

Signature and/or stamp.

Signature et/ou cachet.



<sup>1</sup>Formerly OBD-116 which was formerly LAA-116, both of which may still be used

USM-94  
 (Est. 11/22/77)

\*Delete if inappropriate  
 Rayez les mentions inutiles.

**ATTACHMENT "A"**

Executed "Request" with Attachment "A"

"Certificate" (unexecuted)

"Summary" with Attachment "B"

"Notice,"

Summons in a Civil Case with Attachment, in English and Dutch

Class Action Complaint, in English and Dutch

Order Setting Initial Case Management Conference and ADR Deadlines, in English and Dutch  
Related Case Order, in English and Dutch

Order Setting Case Management Conference, in English and Dutch

Contents of Joint Case Management Statement, in English and Dutch

ECF Registration Information Handout, in English and Dutch

Reverse of the request  
CERTIFICATE

The undersigned authority has the honour to certify, in conformity with Article 6 of the Convention,

1) that the document has been served\*

- the (date) **March 6<sup>th</sup> 2008**

- at (place, street, number, country) **Amsterdam, Amstelplein 2, The Netherlands**

- in one of the following methods authorised by Article 5:

a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of Article 5 of the Convention\*.

b) in accordance with the following particular method\*: personal service by **gerechtsdeurwaarder (court bailiff)**  
**J.C. Haak upon defendant Koninklijke Philips Electronics N.V., who is represented by Mrs. Inge Hoepertz, secretary in the legal department of the defendant.**

c) by delivery to the addressee, who accepted it voluntarily\*.

The documents referred to in the request have been delivered to:

- (identity and description of person) **Mrs. Inge Hoepertz**

• .....

- relationship to the addressee (family, business or other): **secretary in the legal department**

• .....

2) that the document has not been served, by reason of the following facts\*:

In conformity with the second paragraph of Article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement\*.

Annexes

Documents returned:

See Attachment "A"

In appropriate cases, documents establishing the service:

1. **Betekeningsexploit (Affidavit of Service), attached**

[your signature and seal]  
Done at **Amsterdam** **March 6<sup>th</sup> 2008.**  
Signature and/or stamp  
**J.C. Haak**

countersignature/seal of  
Dutch Central Authority



# **EXHIBIT B**

1 KRIS MAN (246008)  
2 Email: kman@dl.com  
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3 One Embarcadero Center, Suite 400  
4 San Francisco, CA 94111  
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17 Attorneys for Defendants  
PANASONIC CORPORATION OF NORTH AMERICA,  
18 MT PICTURE DISPLAY CORPORATION OF AMERICA (NEW YORK),  
MT PICTURE DISPLAY CO., LTD and  
19 MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD.

20  
21 **UNITED STATES DISTRICT COURT**  
22 **NORTHERN DISTRICT OF CALIFORNIA**

23 IN RE: CATHODE RAY TUBE (CRT) } No. 07-5944-SC  
24 ANTITRUST LITIGATION } MDL. No. 1917

25 This Document Relates to: ALL DIRECT }  
26 PURCHASER ACTIONS }  
27  
28

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that the undersigned law firms of Dewey & LeBoeuf  
3 LLP, and Weil, Gotshal & Manges LLP, hereby state their appearance in the direct purchaser  
4 CRT cases on behalf of defendant Matsushita Electric Industrial Co., Ltd. ("MEI").

5  
6 Dated: July 28, 2008

Respectfully submitted,

7 DEWEY & LEBOEUF LLP

8  
9 By: s/Jeffrey L. Kessler  
10 Jeffrey L. Kessler (*admitted pro hac vice*)  
11 A. Paul Victor (*admitted pro hac vice*)  
12 Eva W. Cole (*admitted pro hac vice*)  
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26  
27  
28 *Attorneys for Defendant Matsushita Electric*  
29 *Industrial Co., Ltd.*

Dewey & LeBoeuf LLP  
One Embarcadero Center, Suite 400  
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# **EXHIBIT C**

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17 Attorneys for Defendants  
18 PANASONIC CORPORATION OF NORTH AMERICA,  
MT PICTURE DISPLAY CORPORATION OF AMERICA (NEW YORK),  
19 MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD. and  
MT PICTURE DISPLAY CO., LTD.

20  
21 **UNITED STATES DISTRICT COURT**  
22 **NORTHERN DISTRICT OF CALIFORNIA**

23 IN RE: CATHODE RAY TUBE (CRT) } No. 07-5944-SC  
24 ANTITRUST LITIGATION } MDL. No. 1917

25 This Document Relates to: ALL DIRECT }  
26 PURCHASER ACTIONS }  
27  
28

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that the undersigned law firms of Dewey & LeBoeuf LLP, and Weil, Gotshal & Manges LLP, hereby state their appearance in the direct purchaser CRT cases on behalf of defendant MT Picture Display Co., Ltd.

5 | Dated: July 28, 2008

Respectfully submitted,

**DEWEY & LEBOEUF LLP**

By: s/Jeffrey L. Kessler  
Jeffrey L. Kessler (*admitted pro hac vice*)  
A. Paul Victor (*admitted pro hac vice*)  
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